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6 Attorney for Derek Salazar
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 DEREK SALAZAR,
15 Defendant.

Case No. 2:12-cr-00082-APG-VCF-3

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between
17 Nicholas A. Trutanich, United States Attorney, and Kimberly M. Frayn, Assistant United
18 States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal
19 Public Defender, and Rebecca A. Levy Assistant Federal Public Defender, counsel for Derek
20 Salazar that the Revocation Hearing currently scheduled on Wednesday, December 18, 2019 at
21 2:00 p.m., be vacated and continued to a date and time convenient to the Court, but no sooner
22 than forty-five (45) days.

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel requires additional time to prepare, investigate, and discuss the
25 case with Defendant. Additionally, defense and government counsels will be out of the office
26 from December 20 – 30, 2019 and therefore, unavailable during that time frame.

- 1 2. The defendant is in custody and agrees with the need for the continuance.
2 3. The parties agree to the need for continuance.
3 4. Additionally, denial of this request for continuance could result in a miscarriage
4 of justice.

5 This is the first request for continuance filed herein.

6 DATED this 10th day of December, 2019.

7
8 RENE L. VALLADARES
9 Federal Public Defender

 NICHOLAS A. TRUTANICH
 United States Attorney

10 /s/ *Rebecca A. Levy*
11 By _____

 /s/ *Kimberly M. Frayn*
 By _____

12 REBECCA A. LEVY
13 Assistant Federal Public Defender

 KIMBERLY M. FRAYN
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 DEREK SALAZAR,

7 Defendant.

Case No. 2:12-cr-00082-APG-VCF-3

8 **ORDER**

9
10 Based on the Stipulation of counsel, good cause appearing, and the best interests of
11 justice being served by the granting of the requested continuance:

12 IT IS THEREFORE ORDERED that the Revocation Hearing currently scheduled on
13 Wednesday, December 18, 2019 at 2:00 p.m., be vacated and continued to
14 February 19, 2020 at 10:30 a.m. in courtroom 6C.

15 DATED this 11th day of December, 2019.

16
17 
18 UNITED STATES DISTRICT JUDGE